

PROPOSED FORM OF VERDICT

We, the jury, duly empanelled and sworn in the above-entitled action, upon our oaths, do find in favor of Plaintiffs, Chuck and Carol Agster and the Estate of Charles Agster, III, and find the full damages to be as follows:

For the Federal Civil Rights Claims:

We find the compensatory damages to be:

\$_____ for Chuck Agster

\$_____ for Carol Agster

\$_____ for the Estate of Charles Agster, III

If you find that punitive damages should be assessed against any of the following Defendants, state the amount awarded:

Defendant Betty Lewis \$_____

Defendant Baruch Reusch \$_____

Defendant Katherina Brokschmidt \$_____

Defendant Kristine Kemper \$_____

Defendant Susan Fisher \$_____

Defendant Michael Wilkins \$_____

Defendant Amanda Garrison \$_____

Defendant Eric Nulph \$_____

Defendant Laura Sodeman \$_____

Defendant Leah Compton \$_____

For the State Law Claims:

\$_____ for Chuck Agster

\$_____ for Carol Agster

For application to the state law claims only, we find the relative degrees of fault to be:

(if a party is not at fault, put a zero (0) on the percentage line for that party)

Defendant Maricopa County _____ %

Defendant Maricopa County Sheriff's
Office _____ %

Defendant Correctional Health Services _____ %

Defendant Sheriff Joe Arpaio _____ %

Defendant Betty Lewis _____ %

Defendant Baruch Reusch _____ %

Defendant Katherina Brokschmidt _____ %

Defendant Kristine Kemper _____ %

Defendant Susan Fisher _____ %

Defendant Michael Wilkins _____ %

Defendant Amanda Garrison _____ %

Defendant Eric Nulph _____ %

Defendant Laura Sodeman _____ %

Defendant Leah Compton _____ %

Plaintiff Chuck Agster _____ %

Plaintiff Carol Agster _____ %

Charles Agster, III

_____ %

Total: 100%

(1) _____

(7) _____

(2) _____

(8) _____

(3) _____

(9) _____

(4) _____

(10) _____

(5) _____

(11) _____

(6) _____

12) _____

(Foreperson)

SOURCE: Adapted from RAJI (Civil) 4th, Verdict Forms, Form 2.